

Defendant's Exhibit 79

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE: FACEBOOK, INC., MDL No. 2843
CONSUMER USER PROFILE Case No.
LITIGATION 18-md-02843-VC-JSC

This document relates to:
ALL ACTIONS

ZOOM DEPOSITION OF FACEBOOK's 30(b)(6)
CORPORATE REPRESENTATIVE - MICHAEL PATRICK CLARK
(Reported Remotely via Video & Web Videoconference)
Denver, Colorado (Deponent's location)
Wednesday, May 18, 2022
Volume I

STENOGRAPHICALLY REPORTED BY:
REBECCA L. ROMANO, RPR, CSR, CCR
California CSR No. 12546
Nevada CCR No. 827
Oregon CSR No. 20-0466
Washington CCR No. 3491
JOB NO. 5210145
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1 A. As I said, I've worked with counsel on 05:07:32
2 that. I just -- I don't have it at the end of the
3 day for you.

4 If -- if you'd like to put it up, I can
5 read what it is. I just -- I don't have that 05:07:40
6 answer right here in front of me.

7 Q. Okay. So that's fine.

8 So the answer is you don't know, right?

9 MR. BLUME: Same objections.

10 THE DEPONENT: As a representative of 05:07:52
11 Facebook, I didn't prepare to answer that. In my
12 personal experience, I work with it. But I -- I
13 just -- I can't articulate it right now. So I --

14 Q. (By Ms. Weaver) So the answer is, as you
15 sit here right now, you don't know what the 05:08:11
16 definition of personal information under the CCPA
17 is, correct?

18 In your personal or in the corporate
19 capacity; is that right?

20	MR. BLUME: Objection. Scope.	05:08:21
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21 You can answer yes or no in your personal
22 capacity.

23 THE DEPONENT: In -- in my personal
24 capacity, I work with product counsel on a regular
25 basis on the definition of what personal 05:08:31

1 information is under CCPA, which is a long and 05:08:33
2 nuanced answer in the context of working with that
3 data every day, because I have come up with and
4 developed that definition under guidance and
5 direction of counsel. 05:08:45

6 In my personal experience, I -- I -- I
7 did not prepare to answer that question, so I
8 cannot answer that I don't know.

9 Q. (By Ms. Weaver) Okay. Well, so -- we
10 have a 30(b)(6) deposition here. You've asked for 05:09:03
11 this document that refers to personal information
12 under CCPA, which is part of the definition of UII,
13 which is within the scope of what data is deleted,
14 and I'm just answering -- I'm just asking, for
15 the jury, can you tell me today, as you sit here, 05:09:20
16 how does Facebook define personal information?

17 MR. BLUME: Objection. Form. And scope.
18 And calls for a legal conclusion under the CCPA.

19 THE DEPONENT: And I -- I really am
20 trying to be responsive. And that's why I'm making 05:09:39
21 sure that it's on the record that I'm answering
22 that I don't know. In --

23 Q. (By Ms. Weaver) Okay.

24 A. -- preparation for this, I came prepared
25 to answer the things related to question 4. And 05:09:48

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